



PLANNING STATEMENT

Section 73 Planning application for Variation of approved drawings and regularisation of works to ref: 20200663

Proposal: Change of use of building from offices to 4 self-contained flats consisting of a one bedroom flat at basement level and north part of ground floor level, a bedsit flat at the remaining south part of the ground floor level, a one bedroom flat at first floor level, and a three bedroom flat at second floor level and third floor level; creation of light well at basement level on front elevation with new window to basement and two light wells on the rear elevation each with a new window to basement, alteration to existing opening to the right of the front door to create new door, removal of chimney stack and repair/refurbishment/replacement of all windows where necessary in property. (Variation of Approved Drawings and regularisation of works to ref: 20200663)

Address: 195 Parrock Street Gravesend Kent DA12 1EW

Dated: 22 December 2025

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1. Introduction

This Planning Statement supports an application made under Section 73 of the Town and Country Planning Act 1990 to vary the approved drawings attached to planning permission ref. 20200663, granted on 30 October 2020.

The application forms part of a coordinated approach to regularising works already undertaken and aligning the planning permission with a new Listed Building Consent application.

The description of development has been subject to a minor amendment, as explained in the accompanying covering letter, to reflect a small design refinement to the front elevation, substituting the previously proposed window for a door. The amendment does not alter the overall nature, scale or intent of the approved development.

2. Site and Planning Background

Planning permission and Listed Building Consent were granted in 2020 for the conversion of the building from offices to four self-contained flats, together with associated works, ref. 20200663, granted on 30 October 2020 and based on the original planning permission earlier that same year.

The planning permission itself included only two conditions: a standard commencement condition and a condition listing the approved drawings. No pre-commencement planning conditions were attached, and the development was lawfully commenced within the three-year period. The planning permission therefore remains extant.

However the Listed Building Consent (20200060) included a number of pre-commencement conditions requiring further details to be submitted. These were not discharged prior to works commencing under the previous ownership. No enforcement action has been taken, and the current applicant is keen to address the position in a clear, open and constructive manner.

3. Purpose of the Section 73 Application

This Section 73 application seeks to vary the approved drawings condition only. Aside from the minor amendment to the description of development outlined in the covering letter, the application does not seek to alter the overall scope of the permission.

The purpose of the application is to:

- Reflect and regularise works carried out to date;
- incorporate a number of minor design refinements; and
- ensure consistency between the planning permission and the accompanying Listed Building Consent application.

Other minor amendments are proposed throughout the scheme and are detailed within the Heritage Statement prepared by James Clague Architects. These changes are modest in nature and are intended to clarify and improve the approved scheme rather than change it in any fundamental way. These works have also been informed by the Structural Appraisal Report, carried out by Gledsdale Associates, Consulting Structural Engineers.

4. Description of Development and Proposed Amendments

The minor amendment to the description of development relates to the front elevation, where a previously proposed window within a 20th-century addition is now proposed to be replaced with a door. The door occupies the same existing opening and does not involve any enlargement or additional alteration to the building envelope.

This amendment is considered to be a small design refinement that:

- sits comfortably within the approved scheme;
- reflects the approved principle of alterations to existing openings and external fabric; and
- does not change the nature, scale or intensity of the development.

In addition, the scheme includes a number of other minor adjustments, all of which are set out in detail in the accompanying Heritage Statement, from pages 29 onwards.

Importantly, the current proposals also incorporate matters previously sought through conditions attached to the Listed Building Consent. These include elements such as waste storage and cycle provision, which were not fully resolved within details submitted for the earlier applications and are now clearly addressed.

5. Planning Considerations

Principle of Development

The principle of converting the building to residential use has already been established by the 2020 planning permission. The current proposals do not revisit or alter that principle.

Design and Appearance

The proposed amendments are limited and relate to detailed design. Taken together, they help refine the scheme and ensure that the final development is functional, coherent and well considered. There is considered to be no resulting harm to the character or appearance of the building or the surrounding area.

Heritage

Heritage matters are addressed in detail within the Listed Building Consent application and the detailed Heritage Statement prepared by James Clague Architects. The planning and listed building applications have been prepared in parallel to allow the Council to consider the proposals in a coordinated way.

6. Regularisation of Works

In July 2025, pre-application advice was sought from Gravesham Borough Council's Planning and Conservation teams to discuss the most appropriate route to regularise works carried out prior to the current ownership and to complete the development lawfully (GBC ref. PRE20250144). This on site meeting and further advice is still awaited.

The submission of a Section 73 application alongside a new Listed Building Consent reflects an established and proportionate approach to resolving the outstanding matters, while maintaining the lawful planning status of the development.

7. Conclusion

The Section 73 application seeks a limited and proportionate variation to the approved drawings associated with an extant planning permission, alongside a minor amendment to the description of development as set out in the covering letter and satisfaction of some of the planning related and Listed building conditions attached to the Listed Building Consent. The proposals do not alter the overall nature, scale or intensity of the approved scheme.

The applications have been submitted in a constructive spirit, with the aim of regularising the development, addressing matters previously outstanding, and enabling the conversion to be completed to an appropriate standard.

For these reasons, it is respectfully requested that planning permission be granted.